

MEMO ENDORSED

20 NORTH CLARK, 30TH FLOOR, CHICAGO, ILLINOIS 60602 • P 312.630.4000 • F 312.630.4011 • TF 888.630.9340

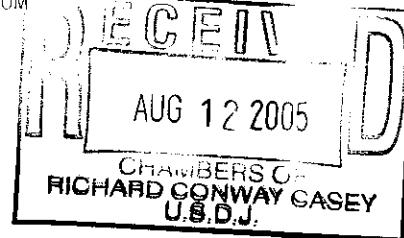
3074 MADISON ROAD, CINCINNATI, OHIO 45209 • P 513.533.2026 • F 513.721.2301

WWW.NOLAN-LAW.COM • CONTACT@NOLAN-LAW.COM

ARTICLE 12. **ADOPTED**

August 11, 2005

*Via Federal Express Overnight Delivery*



Hon. Richard Conway Casey  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street - Room 1350  
New York, NY 10007-1312

RE: *In Re Terrorist Attacks of September 11, 2001 - MDL No. 1570 (RCC):  
Burnett v. Al Baraka Investment & Development, et al.  
Case No. 03 CV 9849 (RCC)  
Gladys Salvo, et al. v. Al Qaeda Islamic Army, et al.  
Case No. 03 CV 5071 (RCC)*

Dear Judge Casey:

We are writing to request Your Honor's permission to consolidate the *Salvo* case with *Burnett*; each case contains identical facts, legal issues, and named defendants. The *Salvo* complaint was filed in the Southern District of New York on July 8, 2003. *Salvo* was subsequently consolidated with the MDL action (03-MDL-1570) on December 9, 2003.

In the interest of judicial economy, we respectfully request that all prior and forthcoming docket entries (e.g., motions, orders, stipulations) filed in *Burnett* also apply retroactively and concurrently with *Salvo*. Your Honor has already endorsed a similar request from the *Ashton* plaintiffs on December 6, 2004.

Accordingly, we respectfully request Your Honor's endorsement of this proposed Order of Consolidation.

Respectfully submitted,

## NOLAN LAW GROUP

~~Floyd A. Wisner~~

FAW/plj

cc: All Counsel (via email)

ADMITTED IN ILLINOIS:

DONALD J. NOLAN • ALBERT E. DURKIN • WILLIAM J. JOVAN • FLOYD A. WISNER • JAMES H. LAWLER, III • WILLIAM A. JAEGER  
ORLA M. BRADY • ADMITTED IN OHIO: JEROME L. SKINNER • OF COUNSEL: JOHN I. LOWREY • CHARLES R. BARNETT III

(N)

SO ORDERED:



August 16, 2005

Richard C. Casey  
U.S. District Court Judge